

ATTACHMENT 1

2 "This action" refers to this civil action now pending in the United States District Court for the District of Columbia

3 The term "document" is used in the broadest possible sense, and includes (but is not limited to) any written, printed, typed, photocopied, photographed, recorded (including but not limited to magnetic, mechanical, or electronic recordings) or otherwise reproduced communication or representation. This definition includes (but is not limited to) correspondence, memoranda, wires, cables, studies, maps, analyses, diagrams, electronic mail, scraps of paper, notes, loan documentation, applications, drawings, charts, graphs, plans, plats, photographs, video tapes, audio tapes, computer disks, hard drives, contracts, agreements, working papers, drafts, reports of investigations or inspections of any kind, opinions of consultants or experts, diaries, minutes, calendars, other reports, vouchers, invoices, journals, bills, orders, time slips or records, books, computations, field notes, logs, financial records or statements, or work papers, checks, receipts, bank statements and the like. Data compilations from which information may be translated into usable form (e.g., computer memory) are also included. The definition includes, as a separate document, each duplicate or reproduction or copy of a document that contains any non-conforming note, marking, material or attachment. If it is maintained that any document requested to be identified has been destroyed or is otherwise no longer within your possession or control, identify the document and state the date, place, and manner of its destruction or removal from your control, and identify the person who authorized or ordered such destruction or removal.

4 "Person" includes individuals, agencies, government entities, corporations, partnerships, unincorporated associations, and other business entities, and specifically includes the plaintiff and defendant in this action, and includes any predecessors or successors in interest

5 The terms "identity," or "identify," or "describe," or "detail," when used in connection with a document mean to describe the document fully, including the character of the document, its title (if any), date, author(s), addressee(s), recipient(s), number of pages, the location and custodian of each copy to the extent known, the substance of the contents thereof, and any other identifying number or information. The terms "identity," or "identify," or "describe," or "detail" when used in connection with an event or condition mean to indicate, as completely and fully as possible, all facts comprising or contributing to the event or condition. The terms "identity," or "identify," or "describe," or "detail" when used in connection with a person mean:

- a where the person is an individual, to state the person's full name, home and business addresses and telephone numbers, and business or other affiliation (including title), and
- b where the person is not an individual, to state the full name of the entity, the nature of the entity, address and telephone number of the entity, and such additional identifying information as may be necessary to enable the "person" to be contacted. When identifying a "person," information should in all cases be adequate to permit service of process or notice of a deposition upon such person.

6 The terms "relating to," "regarding," and "referring to" shall be interpreted broadly, including both explicit and implicit reference and meaning (without limitation) relating to, regarding, referring to, constituting, defining, discussing, containing, construing, embodying, reflecting, stating, dealing with, prepared in contemplation of, prepared in connection with, prepared as a result of, or in any way pertaining to

7 Use of the singular tense shall be deemed to include the plural and vice versa

Use of either the masculine or feminine pronoun shall be deemed to include both genders "And" as well as "or" shall be construed either disjunctively or conjunctively so as to permit the inclusion of materials or information otherwise excluded

8 In responding to these Requests, please furnish all information available to you or within your control, including any information in the possession of agents, attorneys, contractors, subcontractors, former employees, officers, members, or any other person acting on your behalf

9 Each Request shall be deemed continuing so as to require supplemental answers in accordance with the Rule 26(e) of the Federal Rules of Civil Procedure

10 In responding to each Request, please identify all contributing sources of information, including the identity of any person consulted or document used in connection with answering such interrogatory and the extent of any person's assistance

11 If a privilege or privileges are asserted as to any information requested by these Requests, or if any Request is otherwise not fully answered, please respond to the extent the Request is not objected to, and state the specific grounds for not fully answering, the legal basis for not fully answering (specifying any privilege asserted), and the facts allegedly giving rise to any claim of privilege Identify any information, document, or other material for which any privilege is asserted, and identify the date and author or generator as well as all persons shown as having been, or otherwise known to you as having been, recipients of such information, document, or other material If you contend that you have attempted to procure the waiver of the privilege, please also identify fully the persons with whom you communicated and the stated reason for refusal to waive the privilege.

12 Where there is no time limit specified, the Requests encompass documents in existence and/or events occurring during the time period from August 1, 2000 through the present.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Documents Identified in Interrogatories and Initial Disclosures

1. Please produce all documents you were requested to identify in plaintiff's first set of interrogatories to you in this action, that you relied on in answering any of the interrogatories, or that reflect or otherwise support your response to any interrogatory.

2. Please produce all documents you identified in your Initial Disclosures

3. Please produce each insurance policy referenced in your response to interrogatories of Plaintiff's First Set of Interrogatories to you, and any policy otherwise covering the Company.

Plaintiff's Performance/Adverse Employment Actions

4. Please produce all documents which discuss, refer, identify, constitute, or support any evaluation (formal or informal) by you of Ms Gaujacq at any time during her employment with the Company

5. Please produce all personnel files or other files maintained by you pertaining to Ms. Gaujacq including, but not limited to, her personnel file, central personnel file, cluster personnel file, local office or division personnel file, hiring file, disciplinary file, termination file, other informal files kept by you, and copies of any documents maintained in any file referencing Ms Gaujacq with respect to her health, leave status, performance, compensation, or any complaints made by or concerning Ms Gaujacq.

6 Please produce all documents which constitute, identify, or refer to any written or oral reprimand, warning, or caution, or any compliment, award, or commendation, given to or concerning Ms Gaujacq

7 Please produce all documents which constitute, identify, or refer to any opportunities, positions, intentions to promote, career plans, or other considerations being given to the future employment of Ms. Gaujacq with the Company from August 2000 forward

8 Please produce copies of all correspondence between Ms Gaujacq and you, or concerning Ms Gaujacq by or to you from any employee of the Company, or concerning Ms Gaujacq between you and any outside person

9 Please produce copies of all documents prepared by you, or at your direction, respecting Ms Gaujacq

10 Please produces copies of all documents that constitute, refer or relate to any complaints regarding Ms Gaujacq or her performance, including, but not limited to, any complaints by the SEPTEN group in charge of nuclear reactor designs in Lyon (France) within the France Energy Branch had complained on June 20, 2004 about a lack of information from Ms Gaujacq

11 Please produce all documents supporting any contention by you that Ms Gaujacq's performance was unsatisfactory

12 Please produce all documents reflecting the employment relationship between the you and Ms Gaujacq (in other words, any contracts, policies or documents governing your employment relationship)

13 Please produce all documents which constitute, refer or relate to any notes taken by you reflecting any evaluation, formal or informal, of Ms Gaujacq

14. Please produce all documents supporting any contention by you that because of any fact discovered by you since the departure of Ms. Gaujacq, that Ms. Gaujacq would not have been hired or would have been fired (after-acquired evidence).

15. Please produce copies of any notes taken by you at any meetings between or among Ms. Gaujacq and any managerial employee or representative of the Company, or any meeting between any persons at which Ms. Gaujacq was discussed.

16. Please produce all email communications between you and Ms. Gaujacq, or between you and any other person referencing Ms. Gaujacq.

17. Please produce all email communications between you and Company managers, supervisors, or employees relating in any manner to Ms. Gaujacq.

18. Please produce all versions (whether drafts, with handwritten notations, etc.) of any communication written by you containing any allegations relating to Ms. Gaujacq.

Mr. Nadal

19. Please produce any and all job descriptions for each position held by you.

20. Please produce all documents reflecting any comparison, whether favorable or unfavorable, made by the Company between you and Ms. Gaujacq.

21. Please produce copies of all performance evaluations done of you.

22. Please produce a copy of your personnel file of Mr. Nadal, and any files maintained by the Company that reference you, your compensation, benefits, performance, evaluations (formal or informal), qualifications and background.

Your Conduct of Superior/Decision Maker

23. Please produce all documents reflecting your level of participation by any decision makers in the acts taken against Plaintiff which are the subject matter of this action.

24 Please produce all documents that constitute, refer or relate to the decision to appoint you to replace Ms Gaujacq as President of EDFINA in the United States

25 Please produce all documents that constitute, refer or relate to your decision to have the EDF auditors to come to the United States offices of EDFINA for the purpose of undertaking a special audit of EDFINA operations and finances during the period Ms Gaujacq had served as EDFINA's President

26 Please produce all documents that constitute, refer or relate to any negotiations for your salary, benefits or other compensation as President of EDFINA

27 Please produce all documents that constitute, refer or relate to your decision to remove Ms Gaujacq from the list of authorized officers of EDFINA with signature authority on the corporate bank accounts

28 Please produce all documents that constitute, refer or relate to your decision to revoke Ms. Gaujacq powers as vice president of EDFINA, including but not limited to revoking the authority to enter into contracts with third parties; the authority to make any representation and/or warranties on behalf of EDFINA; and, the authority to incur any expenses of behalf of EDFINA

29 Please produce all documents that constitute, refer or relate to your decision to change the locks on the company book closet where the corporate books were kept

30 Please produce all documents that constitute, refer or relate to the decision to deny Mike Slavitt access to the company's books

31 Please produce all documents that constitute, refer or relate to the decision to terminate Mike Slavitt and the reasons for the termination

32 Please produce all documents that constitute, refer or relate to your instruction to Ms Gaujacq to bring all files, documents and any electronic email or other data she had at home or on her laptop relating to the multi-national nuclear power joint venture and a key, strategic initiative of EDFINA and EDF (the "Project") to his office

33 Please produce all documents that constitute, refer or relate to the decision to remove Ms Gaujacq from her position on the Project with EDFINA in the United States

34 Please produce all documents that constitute, refer or relate to the decision to direct Ms Gaujacq to return to France immediately, without an assigned position;

35 Please produce all documents that constitute, refer or relate to the decision to refuse to sign Ms Gaujacq's expatriation contract as earlier promised

36 Please produce all documents that constitute, refer or relate to the decision to give Ms Gaujacq only four days' notice that her mission in the United States would end on August 1, 2004

37 Please produce all documents that constitute, refer or relate to the decision not to propose a position for Ms Gaujacq in the EDF Energy Branch in France until November 1, 2004.

Policies, Procedures and Education

38 Please produce documents sufficient to reflect all educational materials you have received and/or seminars you have attended since 1996 regarding gender discrimination or retaliation for complaining of discrimination.

39 Please produce copies of any employee handbook given to you by the Company or otherwise in effect since 1996.

Damages

40 If you believes you have suffered or been damaged as a result of Ms. Gaujacq's actions, please produce all documents supporting your allegation

41 Please produce all documents respecting Ms. Gaujacq's damages, including any documents supporting any claim that Ms. Gaujacq is not entitled to all or part of the damages claimed (this request relates specifically to the amount of damages, not to the merits of the underlying claims)

Financials

42 Please produce all documents reflecting your financial status for the past three years, including but not limited to, federal and state income tax returns and related schedules and attachments, W-2s and 1099s, real estate assessments for property owned by you, and copies of all statements for the past year of asset accounts (savings, stock, insurance, etc). If you have submitted any applications for credit or refinancing in the past three years, please include a copy of the application reflecting assets and liabilities

Answer and Grounds of Defense

43 Please produce all documents relating to or supporting your partial or full denial of any allegation contained in the Complaint

44 Please produce all statements, whether written, oral, electronic, or recorded, by any person regarding any aspect of the claims, defenses, or facts relevant to this case

45 Please produce documents supporting your Affirmative Defenses.

Miscellaneous

46 Please produce copies of all documents that constitute, refer or relate to any allegations by you that Ms. Gaujacq was paying fees to consultants and contractors of the company without services being performed.

47 Please produce copies of all documents that constitute, refer or relate to your demand that Ms. Gaujacq provide you with all of her business and company contacts

48 Please produce all documents that constitute, refer or relate to any contention by you of any wrongdoing or accounting improprieties that occurred during Ms. Gaujacq's tenure as President of EDFINA.

49 Please produce all documents gathered during the preparation of the defense of this action, including documents received as responses to subpoenas, voluntary requests for documents to outside parties, and internal document-gathering processes

50 Please produce all documents you contend are relevant in any way to this action

51 For each Request for Admission you deny, either in whole or in part, please produce all documents that support any such denial.

October 28, 2005

Catherine Gaujacq,
By Counsel

A handwritten signature in black ink, appearing to read "Elaine Bredehoff", written over a large, vertical, oval-shaped stamp or mark.

Elaine Charlson Bredehoff
D C Bar No 441425
Kathleen Z Quill
D C Bar No 489079
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11260 Roger Bacon Drive
Suite 201
Reston, Virginia 20190
(703) 318-6800

Counsel for Plaintiff,
Catherine L Gaujacq

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing PLAINTIFF'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS TO DEFENDANT CHRISTIAN NADAL by first-class mail, postage pre-paid, this 28th day of October, 2005, addressed to counsel as follows:

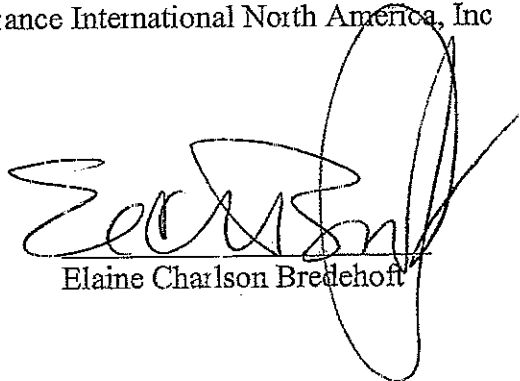
Ronald S. Cooper, Esq
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
(202) 429-3000

Counsel for Defendant
Christian Nadal

With a courtesy copy sent this same day by first class mail, postage pre-paid, addressed as follows:

Laura B. Hoguet, Esq
HOGUET NEWMAN & REGAL, LLP
10 East 40th Street
New York, New York 10016
(212) 689-8808

Counsel for Defendants Electricite de France, S A and
Electricite de France International North America, Inc



Elaine Charlson Bredehoff

ATTACHMENT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	)	
CATHERINE GAUJACQ	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:05CV0969 (JGP)
	)	
ELECTRICITE DE FRANCE	)	
INTERNATIONAL NORTH AMERICA,	)	
INC , et al.	)	
	)	
Defendants	)	
_____	)	

**DEFENDANT NADAL'S SUPPLEMENTAL RESPONSE TO PLAINTIFF'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Defendant Christian Nadal, by counsel, hereby objects and responds to Plaintiff Catherine Gaujacq's First Request for Production of Documents. These supplemental responses are provided pursuant to the parties' agreement as stated in the letter from Kathleen Z. Quill to Ronald S. Cooper dated March 10, 2006, and do not serve as an admission that Mr. Nadal's original responses were in any way deficient, or non-compliant with the Federal Rules. Where Mr. Nadal's supplemental responses indicate that he has not produced any documents in response to a particular request, such a response indicates only that no documents were produced that were under his personal possession, custody or control. Other responsive documents may have been produced by Defendant EDFINA, which would be under Mr. Nadal's custody and control as the President of that organization. By responding herein, Mr. Nadal does not waive any objection he may have to the relevance or admissibility of any document. Mr. Nadal reserves the right to revise or

supplement any objection or response at any time, and will supplement these responses to the extent required by the Federal Rules.

GENERAL OBJECTIONS

Each Request is subject to the General Objections listed below.

1. Mr. Nadal objects to each Request for Production (“Request”) to the extent that it does not convey with reasonable clarity what Mr. Nadal is asked to produce, or is otherwise vague or ambiguous. Mr. Nadal specifically objects to Plaintiff’s definition and use of the term “Company,” as it conflates and confuses two distinct corporate entities.

2. Mr. Nadal objects to each Request to the extent that it is unduly burdensome and oppressive.

3. Mr. Nadal objects to each Request to the extent that it is overly broad, and not relevant to any issue in the case.

4. Mr. Nadal objects to each Request to the extent that it reflects inaccurate premises and/or presumptions.

5. Mr. Nadal objects to each Request to the extent it seeks information protected by the attorney-client privilege or the work product doctrine. Mr. Nadal will not provide such information.

6. Mr. Nadal objects to each Request to the extent that the instructions, definitions, or individual Requests attempt to impose obligations and requirements that are different from, or more burdensome than, the obligations and requirements imposed by the Federal Rules of Civil Procedure.

7. Mr. Nadal objects to each definition and instruction that purports to require identification of people or things, or otherwise require information beyond what is contained in

the documents themselves. These interrogatory-style instructions are inappropriate for requests for production.

8. Mr. Nadal objects to each Request that should properly be directed to one of the corporate defendants in this matter. Mr. Nadal object to the Requests to the extent they seek documents that are within the possession, custody or control of one of the corporate defendants in this action. Each response is limited to those documents in Mr. Nadal's personal possession, custody and control, and excludes any documents he may hold or control as an officer of defendant EDFINA, or employee of defendant EDF

9. Mr. Nadal objects to each Request to the extent that it requires production of documents that are protected from disclosure by contract, or by privacy or other laws of France or the United States. A statement that Mr. Nadal will produce documents responsive to any particular request should not be understood as representation that responsive documents exist.

10. All documents produced pursuant to this Response will be produced subject to the terms of Protective Order agreed among the parties and submitted to the Court on December 6, 2005.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Documents Identified in Interrogatories and Initial Disclosures

1. Please produce all documents you were requested to identify in plaintiff's first set of interrogatories to you in this action, that you relied on in answering any of the interrogatories, or that reflect or otherwise support your response to any interrogatory.

RESPONSE: Mr. Nadal objects to Request No. 1 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those

objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

2. Please produce all documents you identified in your Initial Disclosures.

RESPONSE: Mr. Nadal objects to Request No. 2 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

3. Please produce each insurance policy referenced in your response to interrogatories of Plaintiff's First Set of Interrogatories to you, and any policy otherwise covering the Company.

RESPONSE: Mr. Nadal objects to Request No. 3 on the basis of the General Objections set forth above, especially General Objections 4 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Plaintiff's Performance/Adverse Employment Actions

4 Please produce all documents which discuss, refer, identify, constitute, or support any evaluation (formal or informal) by you of Ms. Gaujacq at any time during her employment with the Company.

RESPONSE: Mr. Nadal objects to Request No. 4 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

5. Please produce all personnel files or other files maintained by you pertaining to Ms. Gaujacq including, but not limited to, her personnel file, central personnel file, cluster personnel file, local office or division personnel file, hiring file, disciplinary file, termination file, other informal files kept by you, and copies of any documents maintained in any file referencing Ms. Gaujacq with respect to her health, leave status, performance, compensation, or any complaints made by or concerning Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 5 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

6. Please produce all documents which constitute, identify, or refer to any written or oral reprimand, warning, or caution, or any compliment, award, or commendation, given to or concerning Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 6 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

7. Please produce all documents which constitute, identify, or refer to any opportunities, positions, intentions to promote, career plans, or other considerations being given to the future employment of Ms. Gaujacq with the Company from August 2000 forward.

RESPONSE: Mr. Nadal objects to Request No. 7 on the basis of the General Objections set forth above, especially General Objections 8. Subject to and without waiving those

objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

8. Please produce copies of all correspondence between Ms. Gaujacq and you, or concerning Ms. Gaujacq by or to you from any employee of the Company, or concerning Ms. Gaujacq between you and any outside person.

RESPONSE: Mr. Nadal objects to Request No. 8 on the basis of the General Objections set forth above, especially General Objections 2, 3 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

9. Please produce copies of all documents prepared by you, or at your direction, respecting Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 9 on the basis of the General Objections set forth above, especially General Objection 1 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

10. Please produce copies of all documents that constitute, refer or relate to any complaints regarding Ms. Gaujacq or her performance, including, but not limited to, any complaints by the SEPTEN group in charge of nuclear reactor designs in Lyon (France) within the France Energy Branch had complained on June 20, 2004 about a lack of information from Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 10 on the basis of the General Objections set forth above, especially General Objection 1 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he

has no responsive documents to produce in his personal capacity.

11. Please produce all documents supporting any contention by you that Ms. Gaujacq's performance was unsatisfactory.

RESPONSE: Mr. Nadal objects to Request No. 11 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

12. Please produce all documents reflecting the employment relationship between the you and Ms. Gaujacq (in other words, any contracts, policies or documents governing your employment relationship).

RESPONSE: Mr. Nadal objects to Request No. 12 on the basis of the General Objections set forth above, especially General Objections 1, 4 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

13. Please produce all documents which constitute, refer or relate to any notes taken by you reflecting any evaluation, formal or informal, of Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 13 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

14. Please produce all documents supporting any contention by you that because of any fact discovered by you since the departure of Ms. Gaujacq, that Ms. Gaujacq would not have been hired or would have been fired (after-acquired evidence).

RESPONSE: Mr. Nadal objects to Request No. 14 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

15. Please produce copies of any notes taken by you at any meetings between or among Ms. Gaujacq and any managerial employee or representative of the Company, or any meeting between any persons at which Ms. Gaujacq was discussed.

RESPONSE: Mr. Nadal objects to Request No. 15 on the basis of the General Objections set forth above, especially General Objection 3 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

16. Please produce all email communications between you and Ms. Gaujacq, or between you and any other person referencing Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 16 on the basis of the General Objections set forth above, especially General Objection 3. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

17. Please produce all email communications between you and Company managers, supervisors, or employees relating in any manner to Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 17 on the basis of the General Objections set forth above, especially General Objection 1 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

18. Please produce all versions (whether drafts, with handwritten notations, etc.) of any communication written by you containing any allegations relating to Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 18 on the basis of the General Objections set forth above, especially General Objection 1. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Mr. Nadal

19 Please produce any and all job descriptions for each position held by you.

RESPONSE: Mr. Nadal objects to Request No. 19 on the basis of the General Objections set forth above. Subject to and without waiving those objections, Mr. Nadal responds that he will produce responsive documents in his personal possession, custody or control, including but not limited to bates numbers CN00001-CN00010.

20. Please produce all documents reflecting any comparison, whether favorable or unfavorable, made by the Company between you and Ms. Gaujacq.

RESPONSE: Mr. Nadal objects to Request No. 20 on the basis of the General Objections set forth above, especially General Objections 1, 8, and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

21 Please produce copies of all performance evaluations done of you.

RESPONSE: Mr. Nadal objects to Request No. 21 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

22. Please produce a copy of your personnel file of Mr. Nadal, and any files maintained by the Company that reference you, your compensation, benefits, performance, evaluations (formal or informal), qualifications and background.

RESPONSE: Mr. Nadal objects to Request No. 22 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Your Conduct of Superior/Decision Maker

23. Please produce all documents reflecting your level of participation by any decision makers in the acts taken against Plaintiff which are the subject matter of this action.

RESPONSE: Mr. Nadal objects to Request No. 23 on the basis of the General Objections set forth above, especially General Objection 1 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

24. Please produce all documents that constitute, refer or relate to the decision to appoint you to replace Ms. Gaujacq as President of EDFINA in the United States

RESPONSE: Mr. Nadal objects to Request No. 24 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

25. Please produce all documents that constitute, refer or relate to your decision to have the EDF auditors to come to the United States offices of EDFINA for the purpose of

undertaking a special audit of EDFINA operations and finances during the period Ms. Gaujacq had served as EDFINA's President.

RESPONSE: Mr. Nadal objects to Request No. 25 on the basis of the General Objections set forth above, especially General Objection 4. There are no documents that are responsive to this request.

26 Please produce all documents that constitute, refer or relate to any negotiations for your salary, benefits or other compensation as President of EDFINA.

RESPONSE: Mr. Nadal objects to Request No. 26 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

27 Please produce all documents that constitute, refer or relate to your decision to remove Ms. Gaujacq from the list of authorized officers of EDFINA with signature authority on the corporate bank accounts

RESPONSE: Mr. Nadal objects to Request No. 27 on the basis of the General Objections set forth above, especially General Objection 4. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

28 Please produce all documents that constitute, refer or relate to your decision to revoke Ms. Gaujacq powers as vice president of EDFINA, including but not limited to revoking the authority to enter into contracts with third parties; the authority to make any representation and/or warranties on behalf of EDFINA; and, the authority to incur any expenses of behalf of EDFINA.

RESPONSE: Mr. Nadal objects to Request No. 28 on the basis of the General Objections set forth above, especially General Objection 4 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

29. Please produce all documents that constitute, refer or relate to your decision to change the locks on the company book closet where the corporate books were kept.

RESPONSE: Mr. Nadal objects to Request No. 29 on the basis of the General Objections set forth above, especially General Objection 4. There are no documents that are responsive to this request.

30. Please produce all documents that constitute, refer or relate to the decision to deny Mike Slavitt access to the company's books

RESPONSE: Mr. Nadal objects to Request No. 30 on the basis of the General Objections set forth above, especially General Objection 4 and 8. There are no documents that are responsive to this request.

31. Please produce all documents that constitute, refer or relate to the decision to terminate Mike Slavitt and the reasons for the termination.

RESPONSE: Mr. Nadal objects to Request No. 31 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity

32. Please produce all documents that constitute, refer or relate to your instruction to Ms. Gaujacq to bring all files, documents and any electronic email or other data she had at home

or on her laptop relating to the multi-national nuclear power joint venture and a key, strategic initiative of EDFINA and EDF (the "Project") to his office.

RESPONSE: Mr. Nadal objects to Request No. 32 on the basis of the General Objections set forth above, especially General Objection 1. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

33. Please produce all documents that constitute, refer or relate to the decision to remove Ms. Gaujacq from her position on the Project with EDFINA in the United States.

RESPONSE: Mr. Nadal objects to Request No. 33 on the basis of the General Objections set forth above, especially General Objections 8 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

34. Please produce all documents that constitute, refer or relate to the decision to direct Ms. Gaujacq to return to France immediately, without an assigned position;

RESPONSE: Mr. Nadal objects to Request No. 34 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

35. Please produce all documents that constitute, refer or relate to the decision to refuse to sign Ms. Gaujacq's expatriation contract as earlier promised.

RESPONSE: Mr. Nadal objects to Request No. 35 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those

objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

36. Please produce all documents that constitute, refer or relate to the decision to give Ms. Gaujacq only four days' notice that her mission in the United States would end on August 1, 2004.

RESPONSE: Mr. Nadal objects to Request No. 36 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

37. Please produce all documents that constitute, refer or relate to the decision not to propose a position for Ms. Gaujacq in the EDF Energy Branch in France until November 1, 2004

RESPONSE: Mr. Nadal objects to Request No. 37 on the basis of the General Objections set forth above, especially General Objection 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Policies, Procedures and Education

38. Please produce documents sufficient to reflect all educational materials you have received and/or seminars you have attended since 1996 regarding gender discrimination or retaliation for complaining of discrimination.

RESPONSE: Mr. Nadal objects to Request No. 38 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with

General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

39. Please produce copies of any employee handbook given to you by the Company or otherwise in effect since 1996.

RESPONSE: Mr. Nadal objects to Request No. 39 on the basis of the General Objections set forth above, especially General Objection 1. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Damages

40. If you believes you have suffered or been damaged as a result of Ms. Gaujacq's actions, please produce all documents supporting your allegation.

RESPONSE: Mr. Nadal objects to Request No. 40 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

41. Please produce all documents respecting Ms. Gaujacq's damages, including any documents supporting any claim that Ms. Gaujacq is not entitled to all or part of the damages claimed (this request relates specifically to the amount of damages, not to the merits of the underlying claims).

RESPONSE: Mr. Nadal objects to Request No. 41 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with

General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Financials

42. Please produce all documents reflecting your financial status for the past three years, including but not limited to, federal and state income tax returns and related schedules and attachments, W-2s and 1099s, real estate assessments for property owned by you, and copies of all statements for the past year of asset accounts (savings, stock, insurance, etc.). If you have submitted any applications for credit or refinancing in the past three years, please include a copy of the application reflecting assets and liabilities.

RESPONSE: Mr. Nadal objects to Request No. 42 on the basis of the General Objections set forth above, especially General Objection 9. Subject to and without waiving those objections, Mr. Nadal responds that he will produce responsive documents in his personal possession, custody or control, including but not limited to bates numbers CN00011-CN00149.

Answer and Grounds of Defense

43. Please produce all documents relating to or supporting your partial or full denial of any allegation contained in the Complaint.

RESPONSE: Mr. Nadal objects to Request No. 43 on the basis of the General Objections set forth above, especially General Objection 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

44. Please produce all statements, whether written, oral, electronic, or recorded, by any person regarding any aspect of the claims, defenses, or facts relevant to this case.

RESPONSE: Mr. Nadal objects to Request No. 44 on the basis of the General Objections set forth above, especially General Objection 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

45. Please produce documents supporting your Affirmative Defenses.

RESPONSE: Mr. Nadal objects to Request No. 45 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

Miscellaneous

46. Please produce copies of all documents that constitute, refer or relate to any allegations by you that Ms. Gaujacq was paying fees to consultants and contractors of the company without services being performed.

RESPONSE: Mr. Nadal objects to Request No. 46 on the basis of the General Objections set forth above, especially General Objection 4. There are no documents that are responsive to this request.

47. Please produce copies of all documents that constitute, refer or relate to your demand that Ms. Gaujacq provide you with all of her business and company contacts.

RESPONSE: Mr. Nadal objects to Request No. 47 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with

General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

48. Please produce all documents that constitute, refer or relate to any contention by you of any wrongdoing or accounting improprieties that occurred during Ms. Gaujacq's tenure as President of EDFINA.

RESPONSE: Mr. Nadal objects to Request No. 48 on the basis of the General Objections set forth above, especially General Objection 4 and 8. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

49. Please produce all documents gathered during the preparation of the defense of this action, including documents received as responses to subpoenae, voluntary requests for documents to outside parties, and internal document-gathering processes.

RESPONSE: Mr. Nadal objects to Request No. 49 on the basis of the General Objections set forth above, especially General Objections 5 and 9. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

50. Please produce all documents you contend are relevant in any way to this action.

RESPONSE: Mr. Nadal objects to Request No. 50 on the basis of the General Objections set forth above. Subject to and without waiving those objections, Mr. Nadal responds that he will produce responsive documents in his personal possession, custody or control, including but not limited to bates numbers CN00001-CN00010.

51. For each Request for Admission you deny, either in whole or in part, please produce all documents that support any such denial.

RESPONSE: Mr. Nadal objects to Request No. 51 on the basis of the General Objections set forth above. Subject to and without waiving those objections, and consistent with General Objection #8, Mr. Nadal responds that he has no responsive documents to produce in his personal capacity.

March 24, 2006

_____/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DEFENDANT NADAL'S SUPPLEMENTAL RESPONSE TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS by electronic mail upon the counsel below, pursuant to the agreement of counsel for all parties to accept service by such method, on March 24, 2006:

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With a courtesy copy by electronic mail as follows:

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_____/s/_____

Kathleen Teale